

TO ACCOMPANY MOTIONS FOR RELIEF FROM STAYAll Cases: Debtor(s) Doris M. Tipton Case No. 15-38267 Chapter 13BANK OF NEW YORK MELLON TRUST COMPANY,
N.A. AS TRUSTEE FOR MORTGAGE ASSETSAll Cases: Moving Creditor MANAGEMENT SERIES 1 TRUST Date Case Filed 11/10/15Nature of Relief
Sought: Lift Stay Annul Stay Other (describe) DismissalChapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed 03/11/2016Chapter 7: No-Asset Report Filed on _____
 No-Asset Report not Filed, Date of Creditors Meeting _____1. Collateral
a. Home _____
b. Car Year, Make, and Model _____
c. Other (describe) _____2. Balance Owed as of 11/1/19 \$289,267.66
Total of all other Liens against Collateral \$0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$350,000.00, per Debtor's Schedules5. Default
a. Pre-Petition Default as of petition date
Number of months 0 Amount \$1,677.55
b. Post-Petition Default
i. On direct payments to the moving creditor
Number of months _____ Amount \$0.00
ii. On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount _____6. Other Allegations
a. Lack of Adequate Protection § 362(d)(1)
i. No insurance _____
ii. Taxes unpaid Amount \$ _____
iii. Rapidly depreciating asset _____
iv. Other (describe) \$2,675.00 owed to Movant for advanced flood insurance
b. No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
c. Other "Cause" § 362(d)(1)
i. Bad Faith (describe) _____
ii. Multiple Filings _____
iii. Other (describe) _____
d. Debtor's Statement of Intention regarding the Collateral
i. Reaffirm ii. Redeem iii. Surrender iv. No Statement of Intention FiledDate: December 9, 2019 _____ /s/ Joel P. Fonferko
(Rev. 12/21/09) _____ Counsel for Movant